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January 19, 2023

VIA ECF

The Honorable Margo K. Brodie Chief United States District Judge Eastern District of New York 225 Cadman Plaza East Brooklyn, NY 11201

Re: United States v. Ng Chong Hwa a.k.a Roger Ng, 18 Cr. 538 (MKB)

Dear Chief Judge Brodie:

We write to request a short adjournment of the sentencing hearing from February 16, 2023, to March 7, 2023, if that date is available to the Court. Both the defense and the government are available on March 7th. We also request a short adjournment of our deadline to file objections to the Presentence Report from Tuesday, January 24th to Friday, January 27th. The reason for our requests is that on January 10, 2023, the Probation Department disclosed a 34-page Presentence Report, as to which we intend to propose substantial additions and modifications.

The government has indicated that it is ready to proceed on February 16, but does not object to an adjournment on or before March 7. The government objects to an adjournment past that date.

Respectfully submitted,

Marc A. Agnifilo, Esq.

cc: Counsel for the government (via ECF)
Probation Officer Jennifer Baumann (via email)